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June 14, 2019

VIA ECF

Honorable Kiyo A. Matsumoto
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States v. Jonathan Braun*, 10-CR-433 (KAM)

Dear Judge Matsumoto:

On May 28, 2019, Jonathan Braun was sentenced before Your Honor to ten years' imprisonment. He was given a self-surrender date of August 25, 2019. We write to respectfully request that the Court extend Mr. Braun's self-surrender date until the end of October. Such an extension would allow Mr. Braun to prepare his family and young children for the upcoming years without his presence. It would also permit Mr. Braun to attend important religious services and holidays that take place throughout this time of year. In light of the enormity of Mr. Braun's ten-year sentence and his continued compliance during a nine-year release on bail, we submit such an extension is justified.

Mr. Braun has been released on bail for nine years, with the majority of the time spent under home confinement with electronic monitoring. Once the home confinement condition was modified, Mr. Braun quickly joined the work force. Quite surprisingly, under the circumstances, he managed to get married, have children, and start a new life. The life he has built with his wife and three young children (ages 4, 3, and 10 months) has undoubtedly been a driving factor in his ability to acclimate to society and a law-abiding existence. While a two-month extension of his self-surrender date will make little difference to his bail (which is presently home confinement pending self-surrender), it would make a world of difference to him and his family in handling this devastating sentence.

Throughout these past years, Mr. Braun has remained in continuous compliance with his bail conditions and has never received a violation. While we acknowledge the issues that the Court has raised during Mr. Braun's sentencing, we respectfully note that the government stated that it did not find that Mr. Braun committed any criminal conduct while on bail. We also note that any allegations against Mr. Braun in a civil context are just that – *allegations* – and have not been proven. We submit that he is not a danger to the community in the slightest, and certainly not a flight risk in light of his current bail

conditions and prior release history. Therefore, we humbly ask that Your Honor grant a two-month extension to Mr. Braun's self-surrender date.

Thank you for your consideration.

Respectfully submitted,

/s/
John Meringolo, Esq.

CC: All counsel (via ECF)